

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IMPERIUM IP HOLDINGS (CAYMAN), LTD.,)
Plaintiff and Counterclaim Defendant,)
v.)) **JURY TRIAL DEMANDED**
SAMSUNG ELECTRONICS CO., LTD.,)
SAMSUNG ELECTRONICS AMERICA, INC.,)
SAMSUNG TELECOMMUNICATIONS)
AMERICA, LLC, AND SAMSUNG)
SEMICONDUCTOR, INC.,)
Defendants and Counterclaim Plaintiffs.)

**DEFENDANTS' NOTICE OF COLLATERAL PROCEEDING
PURSUANT TO LOCAL RULE 42(A)**

Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively, "Samsung") hereby provide notice that on November 16, 2015, in the District of Delaware, Defendants filed a complaint against plaintiff Imperium IP Holdings (Cayman), Ltd. for breach of contract (Civil Action No. 15-1059).

Dated: November 23, 2015

Respectfully submitted,

/s/ *Steven Pepe*
By: (with permission by John F. Bufe)
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Attorneys for Defendants Samsung Electronics Co., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2015, the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and thereby served upon counsel of record.

By: *John F. Bufe*
JOHN F. BUFE